



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

MB/AS  
F. #2019R01465

*271 Cadman Plaza East  
Brooklyn, New York 11201*

October 26, 2020

By ECF and Overnight Mail

Alex Spiro, Esq.  
Quinn Emanuel Urquhart & Sullivan, LLP  
51 Madison Ave., 22<sup>nd</sup> Floor  
New York, NY 10010

Re: United States v. Javier Aguilar  
Criminal Docket No. 1:20-CR-00390 (ENV)

Dear Mr. Spiro:

Enclosed please find the government's third production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This production supplements the government's earlier productions. The government also requests reciprocal discovery from the defendant.

Specifically, enclosed please find: (1) the contents, other than potentially privileged material to which the case team does not have access, of a third email account used by the defendant, BATES numbered JVA-EMAIL-0000514740 - JVA-EMAIL-0000516054;<sup>1</sup> (2) records provided to the United States by Curacao and Panama in response to Mutual Legal Assistance Treaty requests, BATES numbered DOJ-JVA-0000036774 - DOJ-JVA-0000047162; and (3) an index of these materials. Because the email account being produced belongs to the defendant, in an abundance of caution, the government is producing a copy of the entire collection of data it received from Google, regardless of whether the information has been seized pursuant to the relevant search warrant.

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<sup>1</sup> The government understands that filter attorney Nicola Mrazek is separately reaching out to you to arrange production of potentially privileged material involving the defendant.

Very truly yours,

SETH D. DUCHARME  
Acting United States Attorney

By: /s/ Mark E. Bini  
Mark E. Bini  
Andrey Spektor  
Assistant U.S. Attorneys  
(718) 254-7000

Enclosures

cc: Clerk of the Court (ENV) (by ECF) (without enclosures)  
Ann Brickley & Adam Schwartz, U.S. Department of Justice (without enclosures)  
Derek Ettinger, Jonathan Robell & Clayton Solomon, U.S. Department of Justice  
(without enclosures)

**Discovery Index: United States v. Javier Aguilar No. 1:20-CR-00390**

<b>Productions 5 - 6 - Thumb Drive 5</b>		
<b>Description</b>	<b>Beg Bates</b>	<b>End Bates</b>
Google SW return for account: sixtotomas007@gmail.com	JVA-EMAIL- 0000514740	JVA-EMAIL- 0000516054
Panama & Curacao MLAT Returns	DOJ-JVA-0000036774	DOJ-JVA-0000047162